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July 25, 2018

By ECF

Honorable Peggy Kuo
U.S. District Court Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *Government Employees Insurance Company et al. v. A.R.A Medical Care, P.C. et al*
Docket No.: 1:18-CV-02852 (JBW)(PK)

Dear Magistrate Judge Kuo:

This firm represents Plaintiffs (collectively, "GEICO") in the above-referenced action. We submit this joint letter on behalf of GEICO and certain defendants designated herein, and in response to the Court's Order to Show Cause entered on July 18, 2018.

GEICO and Defendants Svetlana Khotenok a/k/a Lana Trotman, A.R.A Medical Care, P.C., Suhel Hussain Ahmed, M.D., Ahmed Medical Care, P.C., Shaikh Jauhar Ahmed, M.D., Horizon PT Care, P.C., Hands On Physical Therapy Care, P.C., Mohamed Hassan Ali Attaya, P.T., Top Tap Acupuncture, P.C., Jubilee Star Acupuncture, P.C., Lily Jou, L.Ac., BNL Acupuncture, P.C. and Run Hong Li, L.Ac. (collectively, "Certain Defendants") are actively engaged in settlement negotiations.

In light of these settlement negotiations, GEICO and Certain Defendants have entered into the enclosed stipulation in which GEICO stipulated to extend Certain Defendants' time to answer or otherwise respond to the Complaint to August 24, 2018, and Certain Defendants voluntarily stipulated and agreed to stay – pending a final determination of the claims in the within federal action – all underlying collections actions commenced on behalf of the following corporate Defendants, A.R.A Medical Care, P.C., Ahmed Medical Care, P.C., Horizon PT Care, P.C., Hands On Physical Therapy Care, P.C., Top Tap Acupuncture, P.C., Jubilee Star Acupuncture, P.C. and BNL Acupuncture, P.C. (collectively, the "PC Defendants"), and which are currently pending before various New York State Civil Courts and the American Arbitration Association ("AAA").

Plaintiffs and Certain Defendants respectfully request that the Court so-order the enclosed stipulation to ensure preservation of the PC Defendants' intent to stay all collections actions and proceedings.

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We appreciate the Court's attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

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Enc.

cc: All counsel via ECF